

REMARKS

Applicants thank the Examiner for the continued attention to the application. Claims 1 - 10 and 23 - 25 are pending in the current application. Applicants have cancelled claims 11 - 22 and 26. Independent claims 1, 10 and 23 have been amended to clarify the scope of protection sought. The amendments are fully supported by the specification as originally filed, in particular at page 6, line 23 - page 7, line 5.

Claim Rejections - 35 USC § 112

The Examiner has rejected claims 1 - 11 under 35 U.S.C. 112, second paragraph as allegedly being indefinite. The Examiner has alleged that it is unclear what concrete steps are involved in such "implementation". The Examiner further alleged, that it is unclear whether implementing the components is intended to merely cause the component to exist or whether the execution of instructions is intended to put existing components to some functional use.

Applicants have amended the independent claims to clarify the executed instructions provide a viewer for creating and manipulating a document object model (DOM). The structure and features of the viewer provided by executing the stored instructions is recited in the claim. Applicants respectfully submit that the meaning of the amended claims is now clear. Applicants submit that claims 1 - 11 comply with 35 U.S.C. 112, second paragraph.

Claim Rejections - 35 USC § 101

The Examiner has rejected claims 1 - 11 under 35 U.S.C. 101, alleging the claimed invention is directed to non-statutory subject matter. The Examiner has alleged that the functional interrelationship between the recited elements is unclear from the claims, and thus, the function result of the claims is uncertain. The Examiner further alleged that because of this uncertainty claims 1 - 11 cannot be said to clearly recite statutory subject matter.

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As set forth above, the claims have been amended to clarify the recited subject matter. Applicants respectfully submit that the amended claims recite statutory subject matter, and so comply with 35 U.S.C. 101.

Claim Rejections - 35 USC § 102

The Examiner has rejected claims 1 - 9 and 11 - 26 under 35 U.S.C. § 102(e) as allegedly being anticipated by U.S. Patent No. 6,981,211 (hereinafter Claussen). Applicants respectfully request reconsideration of the rejection for at least the reasons set forth below.

As noted supra, claims 11-22 and 26 have been cancelled. As to the remaining claims, Claussen teaches a system and method for processing a DOM tree using a tagbean. The processing taught by Claussen receives an input file, creates a DOM tree then searches through the tree for nodes with custom tags. When a custom tag is found the processing can call a tagbean that performs a simple macro substitution or a more complex algorithmic reorganization and manipulation of the tree. In broad terms the tag invokes a custom method that processes the node (or DOM). The processing of the DOM tree then produces a new document. The system taught by Claussen is for dynamically serving web content.

The current claimed invention is not for serving dynamic content but for manipulating and displaying a DOM of a markup file. For example, a browser may include a viewer as described in the current application to manipulate and display pages that it receives. This is not taught by Claussen, which describes server side techniques for dynamically serving web pages.

Furthermore, the current claimed invention recites using behavior elements to modify the DOM. The behavior element specified in the markup file describes how to manipulate the DOM. This is done using attributes of the behavior elements. Claussen teaches away from including information how to manipulate the DOM within a tag, by using a tag handler that

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performs the algorithmic reorganization and manipulation of the DOM tree. In order to manipulate a DOM according to the teachings of Claussen, one would require knowledge of a programming or scripting language. By contrast, the current invention describes specifying how to manipulate a DOM in a behavior element. Since the viewer is provided with predetermined scripts, a user does not require the scripting or programming knowledge of Claussen to manipulate the DOM.

Applicants have amended the independent claims to clarify the scope of protection sought. Applicants respectfully submit that Claussen does not teach or suggest a viewer for creating, manipulating and displaying the DOM from a received markup file. The tag libraries taught by Claussen differ from the collection of predefined document object model behavior elements recited in amended claim 1 of the present application.

Claussen further fails to teach or suggest a collection of scripts for performing actions associated with the set of behavior elements, each script associated with a behavior element, the actions manipulating the document object model in a predefined manner according to the script associated with the behavior element and the attributes of the instance of the behavior element in the markup file.

Claussen further fails to teach or suggest associating behavior elements with an event that is monitored by the viewer. Since Claussen is directed towards server side dynamic content serving, there is no suggestion of manipulating the DOM based on viewer events, such as for example an onClick event.

As set forth above, Claussen describes server-side techniques for dynamically serving content. By contrast, the current invention describes manipulating a DOM through the use of predefined elements having attributes describing the desired behavior. Applicants respectfully

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submit that current independent claims 1, 10 and 23, and claims 2-9, 24 and 25 recite subject matter that is not anticipated by Claussen, and so comply with 35 U.S.C. 102(e).

In addition there is no suggestion found in Claussen that would lead one skilled in the art to modify the teachings of Claussen to arrive at the subject matter recited by the amended claims. Accordingly Applicants respectfully submit that current claims 1 - 10 and 23 - 25 are patentable over Claussen.

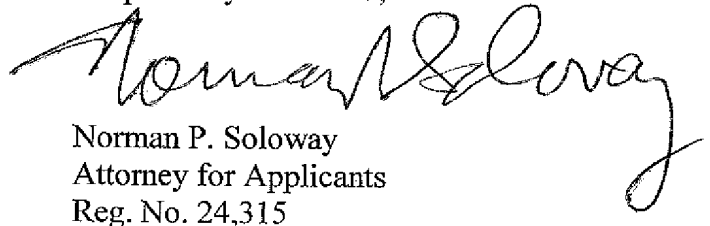
Closing

In view of the amendments, remarks, and having dealt with all of the objections raised by the Examiner, Applicant respectfully submits that the current application is in a state of allowance. Reconsideration and allowance is courteously requested.

Having dealt with all the objections raised by the Examiner, the Application is believed to be in order for allowance. Early and favorable action are respectfully requested.

In the event there are any fee deficiencies or additional fees are payable, please charge them (or credit any overpayment) to our Deposit Account Number 08-1391.

Respectfully submitted,



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